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Department of Energy
Richland Operations Office
P.O. Box 550
Richland, Washington 99352

02-RCA-118

JAN 11 2002

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Nuclear Waste Program
Washington State
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Seattle, Washington 98101

Addressees:

NOTIFICATION OF OFF-PERMIT CHANGE TO THE HANFORD SITE TITLE V AIR
OPERATING PERMIT (NUMBER 00-05-006) FOR OUTSTANDING NOTICE OF
CONSTRUCTION APPROVALS

Enclosed is a notification of off-permit change to the Hanford Site Title V Air Operating Permit.
This notification includes twelve notice of construction approvals. These approvals are:

AIR 01-602
AIR 01-607
AIR 01-608
AIR 01-609

AIR 01-803
AIR 01-805
AIR 01-1005
AIR 01-1010

AIR 01-1014
AIR 01-1016
DE 01NWP-001
DE 01NWP-003

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Enclosure

**NOTIFICATION OF OFF-PERMIT CHANGE TO THE HANFORD SITE TITLE V AIR
OPERATING PERMIT**

Consisting of 5 pages, including coversheet

HANFORD SITE AIR OPERATING PERMIT

Notification of Off-Permit Change

Permit Number: ~~HF-AOP-00-100-05-006~~

This notification is provided to Washington State Department of Ecology, Washington State Department of Health, and the U.S. Environmental Protection Agency as notice of an off-permit change described as follows.

This change is allowed pursuant to WAC 173-401-724(1) as:

1. Change is not specifically addressed or prohibited by the permit terms and conditions
2. Change does not weaken the enforceability of the existing permit conditions
3. Change is not a Title I modification or a change subject to the acid rain requirements under Title IV of the FCAA
4. Change meets all applicable requirements and does not violate an existing permit term or condition
5. Change has complied with applicable preconstruction review requirements established pursuant to RCW 70.94.152.

Provide the following information pursuant to WAC-173-401-724(3):

Description of the change:

1. AIR 01-602, 6/11/01 (issued under WAC 246-247)
This project is limited to entering the 224-T Facility to determine the condition and contents of the facility's cells, tank, and vessels. Individual characterization activities are specified.
2. AIR 01-607, 6/11/01 (issued under WAC 246-247)
This notice of construction approval, issued under WAC 246-247, replaces all previous conditions and limitations for construction and operation of the Material Sciences Laboratory, 326 Building.
3. AIR 01-608, 6/26/01 (issued under WAC 246-247)
This project involves assorted activities including size reduction, mechanical cleaning, decontamination and removal of ductwork, and liquid decontamination of radiologically contaminated surfaces for the EP-324-01-S Emission Unit.
4. AIR 01-609, 6/28/01 (issued under WAC 246-247)
The scope of this project is the removal of 2008 cubic feet of radioactive asbestos from the exterior of ten buildings in the 200 East and 200 West areas. Asbestos is primarily on outside piping and valves.
5. AIR 01-803, 8/23/01 (issued under WAC 246-247)
This notice of construction approval, issued under WAC 246-247, replaces all previous conditions and limitations for Medical Isotope Research Using Th-232 in the Radiochemical Processing Laboratory, 325 Building.
6. AIR 01-805, 8/22/01 (issued under WAC 246-247)
The scope of this project is limited to exhausting the annulus of the 241-AZ-101 and 241-AZ-102 double-shell tanks.
7. AIR 01-1005, 10/09/01 (issued under WAC 246-247)
The scope of this project is limited to the stabilization of the 244-AR Vault by removing the

pumpable liquid from the facility tanks and sumps and transferring it into the Double Shell Tank system.

8. AIR 01-1010, 10/16/01 (issued under WAC 246-247)

The scope of the T-Plant Complex Fuel Removal Project is limited to the activities required to prepare for, and perform fuel handling, canister loading, canister drying and creating an inert atmosphere inside the canister, and cask loading within the 221-T Canyon, and subsequent cask transportation to the Canister Storage Building (CSB). Upon completion of the project, the pool water will be pumped out and transferred (e.g. tanker trucks or hard piping) to a permitted liquid waste treatment/disposal facility.

9. AIR 01-1014, 10/25/01 (issued under WAC 246-247)

The scope of this project is the demolition of the roof, walls, floor, and foundation of the 303-K Storage Facility in the 300 Area. The roof and walls of the 3707-G Building will also be removed, and existing utilities and piping will be blanked as necessary.

10. AIR 01-1016, 10/30/01 (issued under WAC 246-247)

The proposed activities are those necessary to receive and store sludge that will be removed from the K Basins and transferred to the T Plant Complex 221-T canyon for interim storage.

11. DE 01NWP-001, 4/24/01 as modified 7/17/01 (issued under WAC 173-460)

The proposed action is thermal stabilization of polycubes in muffle furnaces using a batch process. The thermal stabilization process will convert polycubes to a form suitable for long term storage.

12. DE 01NWP-003, 9/17/01 (issued under WAC 173-460)

This approval covers the storage, transfer and staging, packaging, treatment and sampling of dangerous, and mixed radioactive waste and contaminated equipment at the various facilities in the T-Plant Complex.

Date of Change:

1. AIR 01-602, dated 6/11/01,
2. AIR 01-607, dated 6/22/01,
3. AIR 01-608, dated 6/26/01,
4. AIR 01-609, dated 6/28/01,
5. AIR 01-803, dated 8/23/01
6. AIR 01-805, dated 8/22/01,
7. AIR 01-1005, dated 10/09/01,
8. AIR 01-1010, dated 10/16/01,
9. AIR 01-1014, dated 10/25/01,
10. AIR 01-1016, dated 10/30/01,
11. DE 01NWP-001, dated 4/24/01 as modified 7/17/01, and
12. DE 01NWP-003, dated 9/17/01.

Describe the emissions resulting from the change:

1. AIR 01-602,
Radioactive air emissions with an annual abated limit of 1.25E-02 mrem/year to the

maximally exposed individual.

2. AIR 01-607,
Radioactive air emissions with an annual abated limit of $8.52\text{E-}05$ mrem/year to the maximally exposed individual.
3. AIR 01-608,
Radioactive air emissions with an annual abated limit of $1.10\text{E-}01$ mrem/year to the maximally exposed individual.
4. AIR 01-609
Radioactive air emissions with an annual abated limit of $3.17\text{E-}05$ mrem/year to the maximally exposed individual.
5. AIR 01-803
Radioactive air emissions with an annual abated limit of $3.00\text{E-}03$ mrem/year to the maximally exposed individual.
6. AIR 01-805
Radioactive air emissions with an annual abated limit of $1.56\text{E-}09$ mrem/year to the maximally exposed individual.
7. AIR 01-1005
Radioactive air emissions with an annual abated limit of $1.30\text{E-}02$ mrem/year to the maximally exposed individual.
8. AIR 01-1010
Radioactive air emissions with an annual abated limit of $8.00\text{E-}09$ mrem/year to the maximally exposed individual.
9. AIR 01-1014
Radioactive air emissions with an annual abated limit of $6.20\text{E-}02$ mrem/year to the maximally exposed individual.
10. AIR 01-1016
Radioactive air emissions with an annual abated limit of $7.97\text{E-}02$ mrem/year to the maximally exposed individual.
11. DE 01NWP-001
TAP emissions are below WAC 173-460 SQERs. Total potential emissions for VOCs and CO are below threshold levels specified in WAC 173-400-110(5)(d). No other criteria pollutants expected.
12. DE 01NWP-003
Expected VOC emissions below NSR trigger level of 2 tons per year. No other criteria pollutants expected. Total emissions from all activities will not result in exceedance of WAC 173-460 ASILs.

Describe the new applicable requirements that will apply as a result of the change:
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Conditions and limitations are as identified in the following issued approval orders:

AIR 01-602, dated 6/11/01,
AIR 01-607, dated 6/22/01,
AIR 01-608, dated 6/26/01,
AIR 01-609, dated 6/28/01,
AIR 01-803, dated 8/23/01,
AIR 01-805, dated 8/22/01,
AIR 01-1005, dated 10/09/01,
AIR 01-1010, dated 10/16/01,
AIR 01-1014, dated 10/25/01,
AIR 01-1016, dated 10/30/01,
DE 01NWP-001, dated 4/24/01 as modified 7/17/01, and
DE 01NWP-003, dated 9/17/01.

For Hanford Use Only:	
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AOP Change Control Number:	Date Submitted:
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Addressees
02-RCA-118

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JAN 11 2002

Should you have any questions regarding this transmittal, please call Astrid P. Larsen, of my staff, on (509) 372-0477.

Sincerely,



Joel Hebdon, Director
Regulatory Compliance and Analysis Division

RCA:APL

Enclosure

cc w/encl:

B. P. Atencio, PNNL
W. T. Dixon, CHG
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R. Gay, CTUIR
W. E. Green, FHI
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R. Jim, YN
R. J. Landon, BHI
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J. G. Woolard, BHI
Environmental Portal, A3-01
Administrative Record